

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

**STATE DEFENDANTS' MOTION FOR  
LEAVE TO FILE MATTERS UNDER SEAL**

State Defendants move this Court to seal the investigative documents filed at [Doc. 1378]. The Court's Deputy Clerk, via electronic mail, directed any documents provided in response to the Court's request be filed under seal to the extent they were also filed under seal in the *Fair Fight Action* litigation. The documents, however, have not been filed in that matter and remain designated under the terms of the protective order in that case. Consequently, good cause exists to seal the discovery documents filed at [Doc. 1378], consistent with the Court's direction for filing these documents from another case and in keeping with the terms of the protective order in *Fair Fight Action v. Raffensperger*, No. 1:18-cv-05391-SCJ.

State Defendants attach a proposed order sealing that filing herewith.

Respectfully submitted this 10th day of May 2022.

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**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing **STATE DEFENDANTS' MOTION FOR LEAVE TO FILE MATTERS UNDER SEAL** was prepared double-spaced in 13-point Century Schoolbook pursuant to Local Rule 5.1(C).

/s/ Vincent R. Russo  
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